



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

NOV 19 1992

Ref: SHWM-FF

Mr. Richard Schassburger
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

re: OU 14 Final Workplan

Dear Mr. Schassburger:

EPA has reviewed your October 19, 1992, Final Workplan submittal. We find that the specific technical comments contained in our review of the draft document have been adequately addressed, but little if any progress has been made in resolving how this workplan will be integrated with the Industrial Area IM/IRA which has been proposed. Reference our letter of September 29, 1992 which stated in part:

"...this failure reduces the work plan to a paperwork exercise which achieves only superficial compliance with established milestones. Until and unless this work plan can be integrated into DOE's overall approach to the Transition, D&D, and Environmental Restoration of Rocky Flats, EPA sees no reason to grant approval of it.

We stand by this statement. The principal deficiency in the Final Workplan is the lack of a DOE commitment to implementation, as evidenced by the absence of any schedule in the document. The explanation it offers about the IM/IRA being the controlling factor on the progress of Remedial Investigation work within the Industrial Area only reinforces our conviction that DOE has no intention of proceeding with the OU 14 fieldwork as described in this plan. Thus, as lead agency for this OU, and after consultation with CDH, EPA is withholding approval of this submittal until such time as an acceptable scope and schedule for the IM/IRA has been agreed on and this plan has been revised to reflect the implications of that action on the scope and schedule of the field investigations.

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ADMIN RECORD

A-OU14-000038

If you have questions or would like to discuss the progress of this effort, please contact Bill Fraser (EPA) at 294-1081.

Sincerely,



Martin Hestmark, EPA
Manager
Rocky Flats Project

cc: Joe Schieffelin, CDH
Scott Grace, DOE
Cindy Gee, EG&G